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6	Theories so the Online States	
7	UNITED STATES DISTRICT COURT	
	DISTRICT OF NEVADA	
8	UNITED STATES OF AMERICA,	Case No. 2:22-mj-00713-DJA
9	Plaintiff,	Stipulation for an Order Directing Probation to Prepare
10	V.	a Criminal History Report
11	RAUL ROSALES-VILLEGAS, aka "Raul Rosales," aka "Raul Osvaldo Rosales,"	
12		
13	aka "Raul Osvaldo Rosales-Villegas,"	
13	aka "Saulo Solorzano,"	
14	Defendant.	
15		
16	IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.	
17	Frierson, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney,	
18	counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and	
19	Assistant Federal Public Defender, counsel for	
20	Defendant RAUL ROSALES-VILLEGAS, that the Court direct the U.S. Probation Office	
21	to prepare a report detailing the defendant's criminal history.	
22	This stipulation is entered into for the following reasons:	
23	1. The United States Attorney's Office has developed an early disposition	
24	program for immigration cases, authorized by the Attorney General pursuant to the	

PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has extended to the defendant a plea offer in which the parties would agree to jointly request an expedited sentencing immediately after the defendant enters a guilty plea.

- 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance when charged by indictment.
- 3. The U.S. Probation Office informs the government that it would like to begin obtaining the criminal history of defendants eligible for the early disposition program as soon as possible after their initial appearance so that the Probation Office can complete the Presentence Investigation Report by the time of the expected expedited sentencing.
- 4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 13th day of September, 2022.

Respectfully Submitted,

RENE L. VALLADARES Federal Public Defender

JASON M. FRIERSON United States Attorney

Assistant Federal Public Defender

Counsel for Defendant RAUL

ROSALES-VILLEGAS

/s/ Jared L. Grimmer JARED L. GRIMMER

Assistant United States Attorney

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UNITED STATES DISTRICT COURT 1 **DISTRICT OF NEVADA** 2 UNITED STATES OF AMERICA, Case No. 2:22-mj-00713-DJA 3 Plaintiff, **Order Directing Probation to** 4 Prepare a Criminal History Report 5 ٧. RAUL ROSALES-VILLEGAS, 6 aka "Raul Rosales," 7 aka "Raul Osvaldo Rosales," aka "Raul Osvaldo Rosales-Villegas," 8 aka "Saulo Solorzano," 9 Defendant. 10 Based on the stipulation of counsel, good cause appearing, and the best interest of 11 justice being served: 12 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a 13 report detailing the defendant's criminal history. 14 DATED this ____ day of September, 2022. 15 16 17 HONORABLE DANIEL J. ALBREGTS UNITED STATES MAGISTRATE JUDGE 18 19 20 21 22 23 24